

Harry B. Wilson, OSB #077214
HarryWilson@MarkowitzHerbold.com
Anit K. Jindal, OSB #171086
AnitJindal@MarkowitzHerbold.com
Erin N. Dawson, OSB #116334
ErinDawson@MarkowitzHerbold.com
MARKOWITZ HERBOLD PC
1455 SW Broadway, Suite 1900
Portland, OR 97201
Telephone: (503) 295-3085
Special Assistant Attorneys General for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

DALLIN MONTGOMERY; NICK
HOLDWAY; KEVIN WALTERS; OREGON
FIREARMS FEDERATION, INC.; and
FIREARMS POLICY COALITION, INC.,

Plaintiffs,

v.

ELLEN ROSENBLUM, in her Official
Capacity as Oregon Attorney General; and
CASEY CODDING, in his Official Capacity
as Superintendent of the Oregon State Police,

Defendants.

Case No. 3:24-cv-01273-AN

**DECLARATION OF ERIN N.
DAWSON IN SUPPORT OF REPLY
IN SUPPORT OF DEFENDANTS'
MOTION TO DISMISS FIRST
AMENDED COMPLAINT AND, IN
THE ALTERNATIVE, MOTION FOR
SUMMARY JUDGMENT**

I, Erin N. Dawson, declare as follows:

1. I am an attorney with Markowitz Herbold PC, attorneys of record for defendants.

I have personal knowledge of the facts set forth herein. If called as a witness, I could and would competently testify to the matters stated herein. I make this declaration in support of the Reply

in Support of Defendants’ Motion to Dismiss First Amended Complaint and, in the Alternative, Motion for Summary Judgment.

2. In the event the Court were to deny Defendants’ Motion to Dismiss First Amended Complaint, defendants would want the opportunity under Federal Rule of Civil Procedure 56(d) to present one or more declarations in opposition to plaintiffs’ cross-motion for summary judgment. In particular, defendants would want to present a declaration from one or more experts qualified to opine on facts relevant to historical firearm development, production, and circulation, as well as to identify and opine on regulations and laws that may act as historical analogues to House Bill 2005 (2023).

I declare under penalty of perjury under the laws of the State of Oregon that the foregoing is true and correct to the best of my knowledge.

Executed December 30, 2024, at Portland, Oregon.

s/ Erin N. Dawson

Erin N. Dawson, OSB # 116334

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